EXHIBIT B

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

DAVID ANNUNZIATO,

Plaintiff,

No. 2:12-CV-03609-ADS-AKT

٧.

COLLECTO, INC. d/b/a EOS CCA,

DEFENDANT'S RESPONSES
TO ADMISSION REQUESTS

Defendant. :

Defendant Collecto, Inc. d/b/a EOS CCA, hereby responds to plaintiff's Request for Admissions, reserving until trial all objections to the relevance or admissibility of the responses, as follows:

REQUESTS FOR ADMISSIONS:

Plaintiff is a natural person.

ANSWER:

Admits.

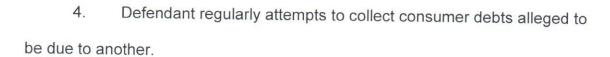
 Plaintiff is a consumer as defined by the FDCPA, 15 U.S.C. §1692a(3).

ANSWER:

Admits.

3. Defendant is engaged in the collection of debts from persons using the mail and/or telephone.

ANSWER:



ANSWER:

Admits.

Defendant attempted to collect an alleged debt from the Plaintiff.

ANSWER:

Admits.

6. The debt that the Defendant attempted to collect from Plaintiff was allegedly incurred for school tuition.

ANSWER:

Admits.

Defendant was and is a "debt collector" as defined by the FDCPA,
 U.S.C. §1692a(6).

ANSWER:

Admits.

8. On or about May 16, 2012 Defendant mailed to Plaintiff the letter attached as Exhibit A to the Plaintiff's complaint in this action.

ANSWER:

9. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 40 or more natural persons with addresses in New York State.

ANSWER:

Admits.

10. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 50 or more natural persons with addresses in New York State.

ANSWER:

Admits.

11. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 60 or more natural persons with addresses in New York State.

ANSWER:

12. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 70 or more natural persons with addresses in New York State.

ANSWER:

Admits.

13. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 80 or more natural persons with addresses in New York State.

ANSWER:

Admits.

14. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 90 or more natural persons with addresses in New York State.

ANSWER:

15. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 100 or more natural persons with addresses in New York State.

ANSWER:

Admits.

16. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 200 or more natural persons with addresses in New York State.

ANSWER:

Admits.

17. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 500 or more natural persons with addresses in New York State.

ANSWER:

Admits.

18. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar

or materially identical to that contained in Exhibit A to Plaintiff's complaint to 1000 or more natural persons with addresses in New York State.

ANSWER:

Admits.

19. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 2000 or more natural persons with addresses in New York State.

ANSWER:

Denies.

20. During the one year immediately preceding the filing of the Complaint in this action, the Defendant sent letters containing language substantially similar or materially identical to that contained in Exhibit A to Plaintiff's complaint to 3000 or more natural persons with addresses in New York State.

ANSWER:

Denies.

21. Defendant's net worth exceeds \$50,000.

ANSWER:

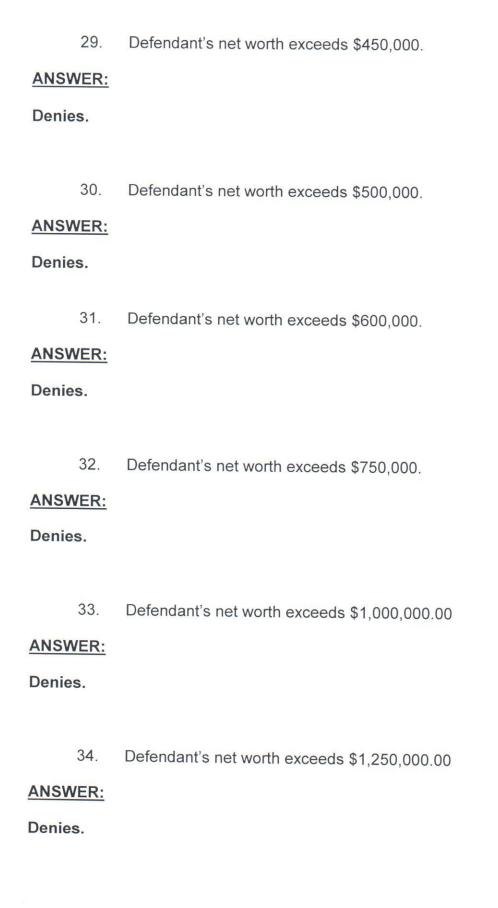
Denies.

22. Defendant's net worth exceeds \$100,000.

ANSWER:

Denies.

23.	Defendant's net worth exceeds \$150,000.
ANSWER:	
Denies.	
24.	Defendant's net worth exceeds \$200,000.
ANSWER:	
Denies. 25.	Defendant's net worth exceeds \$250,000.
ANSWER:	να του ποι ποι πολοσσασ φ200,000.
Denies.	
26	Defeated
26.	Defendant's net worth exceeds \$300,000.
ANSWER:	
Denies.	
27.	Defendant's net worth exceeds \$350,000.
ANSWER:	
Denies.	
28.	Defendant's net worth exceeds \$400,000.
ANSWER:	
Denies.	



Defendant's net worth exceeds \$1,500,000.00

35.

ANSWER:		
Denies.		
36.	Defendant's net worth exceeds \$1,750,000.00	
ANSWER:		
Denies.		
37.	Defendant's net worth exceeds \$2,000,000.00	
ANSWER:		
Denies.		
38.	Defendant's net worth exceeds \$3,000,000.00	
ANSWER:		
Denies.		
39.	Admit that Defendant has no factual basis to believe that the	
Plaintiff is not an adequate class representative in this action.		
ANSWER:		
Neither admits not denies. Information currently available to the defendant does not permit a response, involving matter that is subject to discovery and later investigation.		

40. Admit that Defendant has no factual basis to believe that Joseph Mauro is not adequate counsel to represent a class in this action.

ANSWER:

Neither admits not denies. Information currently available to the defendant does not permit a response, involving matter that is subject to discovery and later investigation.

41. Admit that Defendant sent the Plaintiff a letter indicating that the Plaintiff owed \$1,382.79 for "Fees/Coll Costs."

ANSWER:

Denies. The letter indicated that the creditor's claim included \$1,382.79 for "Fees/Coll Costs."

42. Admit that Defendant had no legal basis to attempt to collect \$1,382.79 from the Plaintiff for "Fees/Coll Costs."

ANSWER:

Denies.

Date: February 1, 2013

THE DEFENDANT COLLECTO, INC. d/b/a EOS/CCA

Jonathan D. Elliot

Zeldes, Needle & Cooper, P.C. 1000 Lafayette Boulevard Bridgeport, CT 06604

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E-Mail: jelliot@znclaw.com

Its Attorneys

CERTIFICATION

This is to certify that a copy of the foregoing has been sent via U.S. First Class Mail, postage prepaid, on this date, to:

> Joseph Mauro, Esq. The Law Office of Joseph Mauro, LLC 306 McCall Avenue West Islip, NY 11795

Dated at Bridgeport, Connecticut on this ____ day of February 2013.